## THE HARMAN FIRM, PC

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May 21, 2015

## Via ECF

Hon. Steven M. Gold United States Chief Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Lillian Vega / AlphaCare of New York, Inc., et al.

14 CV 5787 (MKB)(SMG)

Dear Judge Gold:

Pursuant to the Order dated May 7, 2015, Plaintiff writes with an update on the parties' agreed-upon deposition schedule.

June 23, 2015	Deposition of Gloria Tutt-King
July 14, 2015	Plaintiff to depose Lori Ferguson
July 21, 2015	Plaintiff to depose Dan Parietti
August 25, 2015	Plaintiff to depose Jessie French Danzi (barring any unforeseen
_	issues with her health following childbirth)

The close of fact discovery is presently set for July 24, 2015. Plaintiff kindly requests an extension of this date solely to accommodate Ms. Danzi's deposition.

We thank the Court for its attention to this matter.

Respectfully submitted,

Wall & Haran fr

Walker G. Harman, Jr.

cc: Barbara E. Hoey, Esq. (via ECF) Jodi M. Frankel, Esq. (via ECF)